

**IN THE UNITED STATES BANKRUPTCY COURT
OF THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	CASE NO. 1:21-bk-00418 HWV
KASEY J. KIRK	:	
Debtor	:	CHAPTER 13

**THIRD MOTION FOR EXTENSION OF TIME TO FILE
SCHEDULES, SUMMARY OF SCHEDULES, STATISTICAL SUMMARY OF
CERTAIN LIABILITIES AND RELATED DATA, MEANS TEST,
PAY STUBS, STATEMENT OF FINANCIAL AFFAIRS AND CHAPTER 13 PLAN**

AND NOW comes Debtor, Kasey J. Kirk, by and through his attorney, Gary J.

Imblum, and respectfully represents:

- 1. Debtor filed a Chapter 13 Bankruptcy to the above term and number on March 2, 2021.**
- 2. Debtor filed the bankruptcy as an emergency filing due to pending lawsuits and a hearing scheduled for March 3, 2021.**
- 3. Debtor's counsel has been unable to gather sufficient information necessary to file the schedules and plan due to the emergency filing. More specifically, Debtor is working to prepare and file his past due tax returns so that the refund/amount owed can be adequately accounted for and provide bank statements.**

4. Debtor filed a First Motion for Extension on March 17, 2021 which was approved by Order dated March 22, 2021.

5. Debtor filed a Second Motion for Extension on April 16, 2021 which was approved by Order dated April 19, 2021.

6. Debtor's schedules are due to the Court on or before May 16, 2021.

7. It is estimated that Debtor's counsel will need an additional 30 days in order to file the bankruptcy schedules and plan.

WHEREFORE, Debtor respectfully requests that this Honorable Court issue an Order extending the deadline for Debtor to file bankruptcy schedules and plan until June 15, 2021.

Respectfully submitted,

IMBLUM LAW OFFICES, P.C.



Gary J. Imblum

Attorney Id. No. 42606

4615 Derry Street

Harrisburg, PA 17111

(717) 238-5250

Fax No. 717 558-8990

Email: gary.imblum@imblumlaw.com

Attorney for Debtor

Dated: May 16, 2021

CERTIFICATE OF SERVICE

I, Bernadette A. Davis, Paralegal, hereby certify that I have served a copy of the foregoing **THIRD MOTION FOR EXTENSION OF TIME TO FILE SCHEDULES, SUMMARY OF SCHEDULES, STATISTICAL SUMMARY OF CERTAIN LIABILITIES AND RELATED DATA, MEANS TEST, PAY STUBS, STATEMENT OF FINANCIAL AFFAIRS, AND CHAPTER 13 PLAN** on the following person(s) by E-Service, addressed to:

**JACK ZAHAROPOULOS ESQUIRE
CHAPTER 13 TRUSTEE
VIA E-SERVICE**

IMBLUM LAW OFFICES, P.C.

Bernadette Davis

**Bernadette A. Davis, Paralegal
4615 Derry Street
Harrisburg PA 17111
717 238-5250
Fax No. 717 558-8990
Email: gary.imblum@imblumlaw.com**

Dated: May 16, 2021

**IN THE UNITED STATES BANKRUPTCY COURT
OF THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	CASE NO. 1:21-bk-00418 HWV
KASEY J. KIRK	:	
Debtor	:	CHAPTER 13

ORDER

Upon consideration of Debtor's Third Motion for Extension of Time to File Schedules, Summary of Schedules, Statistical Summary of Certain Liabilities and Related Data, Means Test, Pay Stubs, Statement of Financial Affairs and Chapter 13 Plan,

**IT IS HEREBY ORDERED AND DECREED that the deadline for filing the
aforementioned pleadings in the above captioned case is extended through June 15, 2021.**